

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Warren Steel Holdings - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #8  
Progress  
Warren Steel Holdings  
C5AV  
Warren, OH  
Latitude: 41.2629796 Longitude: -80.7990185

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**From:** Stephen Wolfe, OSC  
**Date:** 7/23/2018  
**Reporting Period:** 7/16/2018 through 7/20/2016

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C5AV	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	2/20/2018
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	4/24/2018	<b>Start Date:</b>	4/24/2018
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	OH0011207	<b>RCRIS ID:</b>	OHD066060608
<b>ERNS No.:</b>		<b>State Notification:</b>	yes
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Time Critical Removal Action

NOTE: POLREPS 1 and 2 were for emergency response actions (initial and final) that occurred 04/27/17 through 6/02/2017

#### 1.1.2 Site Description

WSH is a former 400-acre steel manufacturing facility. The site was in operation from at least the 1940s, and all operations official ceased at the facility in January 2016. EPA is gathering all drums and containers of hazardous waste that was abandoned at the facility as well as inspecting approximately 100 transformers for possible pcb oil/threat to waterway.

##### 1.1.2.1 Location

4000 Mahoning Street, Warren, Ohio.

##### 1.1.2.2 Description of Threat

EPA and Ohio EPA documented abandoned drums/totes/other containers containing hazardous waste (corrosives, pcb oil, used oil) at the site. EPA performed a site assessment on April 27, 2017 and documented that some of the material had a pH of 1-2 standard units and 14 standard units. A sample of oil from a pit on the site tested positive for pcbs at 90 ppm. Labeling is present on the majority of the containers indicating sulfuric acid, caustics, and water treatment chemicals.

Approximately 100 transformers are present on site, half of which are located near the bank of the Mahoning River. No data is available on whether or not the transformers contain oil/pcb oil. EPA will

investigate the transformers as part of the Removal Action and handle appropriately.

### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Information from Ohio EPA and the EPA site assessment indicated the presence of caustic material (acid and bases) as well as used, oil, and pcb contaminated oil. The EPA site assessment noted the presence of possible asbestos containing materials; however, asbestos removal is not a part of this removal action. EPA will address any loose asbestos if the material inhibits the ability to gather the containers of hazardous waste.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

This is a Time Critical Removal Action focusing on the removal of drums and other containers of hazardous waste. Electrical Transformers will also be inspected to determine if they are full of oil/pcb oil.

#### 2.1.2 Response Actions to Date

During the week of July 16th, 2018 ERRS consolidated partial containers of wastes into the respective waste streams. All Request for Bids for Transportation and Disposal was sent to sub-contractors and bids were analyzed as received. ERRS relocated the wastes from the waste water treatment area to the main part of the facility.

Throughout the week, ERRS cut up empty drums for disposal.

On Thursday July 19th, a representative from Airgas was on site and retrieved 38 of their cylinders for recycling. A representative from Praxair was on site and removed 13 of their cylinders for recycling.

On Friday, July 20th, a representative from ESSIX Resources was on site and removed 10 supersaks of silica sand for re-use.

START provided air monitoring and oversight support throughout the week as needed

#### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Ongoing.

#### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Bulk Solids	Solid	22 tons	NA	re-use	NA
Bulk Solids	Solid	15 tons	NA	re-use	NA
Cylinders	Solid	38	NA	recycling	Airgas
Cylinders	Solid	10	NA	recycling	Praxair

### 2.2 Planning Section

#### 2.2.1 Anticipated Activities

T&D of waste  
Drain pcb contaminated transformers  
consolidate HILTI strips (used/unused)

##### 2.2.1.1 Planned Response Activities

Disposal activities are expected to begin the week of July 15, 2018

##### 2.2.1.2 Next Steps

#### 2.2.2 Issues

Disposal Quotes for partially unused HILTI strips were received and were high. ERRS will process the strips separating used from unused to consolidate and save funding.

One tote of sulfuric acid was discovered to be leaking (minor) prior to relocating the tote from the waste water treatment plant to the main facility. ERRS wrapped the tote in plastic sheeting and left it in place to transfer the contents into a new tote.

### 2.3 Logistics Section

ERRS provided all logistics for the site

### 2.4 Finance Section

#### 2.4.1 Narrative

EPA Branch Chief verbally authorized a \$50,000 ceiling for the Emergency Response phase.

An Action Memo was signed on February 2, 2018 for the time critical removal action with a ceiling limit of \$1,878,830 for removal actions. A delivery order was issued to ERRS for \$300,000 to begin response actions.

On May 22 the ERRS Ceiling was increased to \$425,000.

On July 11 the START ceiling was increased to \$43,850

On July 17, 2018 the OSC requested and management approved an ERRS ceiling increase of \$250,000 (new ceiling \$675,000)

#### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$425,000.00	\$320,000.00	\$105,000.00	24.71%
TAT/START	\$43,850.00	\$25,000.00	\$18,850.00	42.99%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$468,850.00</b>	<b>\$345,000.00</b>	<b>\$123,850.00</b>	<b>26.42%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

Safety briefings are held before the start of every workday and at the end of the work day

### 2.5.2 Liaison Officer

OSC Steve Wolfe

### 2.5.3 Information Officer

OSC Steve Wolfe

## 3. Participating Entities

### 3.1 Unified Command

OSC Steve Wolfe

### 3.2 Cooperating Agencies

OSC Steve Wolfe

## 4. Personnel On Site

1 EPA  
1 START  
5 ERRS

## 5. Definition of Terms

No information available at this time.

## 6. Additional sources of information

**6.1 Internet location of additional information/report**  
response.epa.gov/WSH

### 6.2 Reporting Schedule

## 7. Situational Reference Materials

NCP and CERCLA.